

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

NITA U. CHAUHAN

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Case No. 23-30560

(Chapter 7)

**AFFIDAVIT OF PROPOSED COUNSEL
PURSUANT TO 11 U.S.C. § 327(A) AND BANKRUPTCY RULES 2014, 2016(B)**

McCloskey Roberson Woolley, PLLC ("MRW"), proposed special litigation counsel for Eva Engelhart, chapter 7 trustee for the estate of Nita U. Chauhan. (the "Trustee"), states that to the best of its knowledge, MRW represents no interest adverse to the estate in the matters upon which this firm has been or is to be engaged; that MRW's employment has been and would be in the best interest of the estate; and that the attorneys in this firm are disinterested persons as defined under 11 U.S.C. § 101(14).

MRW has represented the Trustee in previous cases pending in the United States Bankruptcy Court for the Southern District of Texas. MRW also currently represents several other chapter 7 trustees and post-confirmation trustees in other active cases.

Except as set forth herein and to the best of its knowledge, MRW has no other connections with the debtor, its creditors, any other parties in interest, their respective attorneys and accountants, the United States Trustee, any person employed in the office of the United States Trustee and is a "disinterested person" within the definition of Section 101(14) of the Bankruptcy Code on the matters for which it is to be engaged as special counsel.

Legal representation undertaken by MRW includes (a) assisting the Trustee in analyzing claims owned by the estate; (b) preparing and filing such pleadings as are necessary to pursue the estate's claims and defend the Trustee; (c) conducting appropriate examinations of witnesses, claimants and other parties in interest in connection with contemplated litigation; (d) representing the Trustee in any adversary proceedings and other proceedings before the Court and in any other judicial or administrative proceeding in which the claims described in the Application to Employ may be affected; (e) collecting any judgment that may be entered in the contemplated litigation; (f) handling any appeals that may result from the contemplated litigation; and (g) performing any other legal services that may be appropriate in connection with the prosecution of the litigation described in the Application to Employ.

MRW has agreed to the hourly rates as set forth in the application and **Exhibit 1** to the application. The agreement is the product of free and arms-length discussions. To date, MRW has not received any funds from the debtor, the estate or the Trustee in connection with the proposed representation in this case.

For any compensation received by MRW, MRW has not promised, either directly or indirectly to share any such compensation with any other persons nor does MRW have any agreement for the payment of attorney's fees and expenses expect as stated herein.

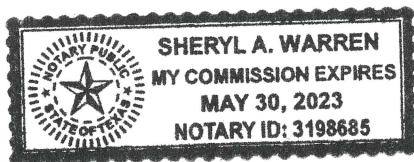
DATED: May 5, 2023.

MCCLOSKEY ROBERSON WOOLLEY, PLLC

By: Thomas A. Woolley, III
Thomas A. Woolley, III
SBOT: 24042196
190 T.C. Jester Blvd., Suite 400
Houston, TX 77007
(713) 337-3900
(713) 337-3915 (fax)

THE STATE OF TEXAS §
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COUNTY OF HARRIS §

SWORN TO AND SUBSCRIBED BEFORE ME, a notary public in the State of Texas, County of Harris, on this the 5th day of May 2023 by Thomas A. Woolley, III, to certify which, witness my hand and seal of office.



Sheryl A. Warren
Notary Public in and for
The State of T E X A S